

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Wicked Nevada, LLC,)	
)	Case No.: 1:19-cv-413-SOM-KJM
Plaintiff,)	(Copyright)
vs.)	DECLARATION OF COUNSEL
)	
JOHN DOE dba YTS,)	
)	
Defendant.)	
)	
)	
)	

DECLARATION OF COUNSEL

KERRY S. CULPEPPER, hereby declares under penalty of law that the following is true and correct:

1. I am an attorney and represent the Plaintiff, I have personal knowledge of the matters stated herein, and this declaration is given in support of Plaintiff's Supplemental Memorandum in Support of the Motion for Leave to File the First Amended Complaint filed herewith.

2. Plaintiff entered into a confidential settlement agreement ("agreement") with proposed defendant SENTHIL VIJAY SEGARAN.

3. Per the agreement, SENTHIL VIJAY SEGARAN agreed to the jurisdiction of the United States District Court for the District of Hawaii.

4. Per the agreement, Plaintiff will submit a proposed stipulated consent

judgment in this case provided SENTHIL VIJAY SEGARAN performs certain acts by 12/15/2019.

5. Based on the foregoing, Plaintiff respectfully requests that it be given leave to file their proposed First Amended Complaint so that the stipulated consent judgment can be submitted.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Kailua-Kona, Hawaii, December 6, 2019.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiff